



Northern States Power Company

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April 26, 1991

10 CFR Part 50  
Section 50.73

U S Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

PRAIRIE ISLAND NUCLEAR GENERATING PLANT  
Docket Nos. 50-282 License Nos. DPR-42  
50-306 DPR-60

Discovery That Certain Piping Inspections Are Not Being  
Made As Required by ASME Section XI Due to Personnel Error

The licensee Event Report for this occurrence is attached.

Please contact us if you require additional information related to this event.

*Jacqueline Gulchrist Jan*

Thomas M Parker  
Manager  
Nuclear Support Services

c: Regional Administrator - Region III, NRC  
NRR Project Manager, NRC  
Senior Resident Inspector, NRC  
MPCA  
Attn: Dr J W Ferman

Attachment

9104300074 910426  
PDR ADQCK 05000306  
S PDR

IE22  
11

## LICENSEE EVENT REPORT (LER)

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 90.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATES TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)

Prairie Island Nuclear Generating Plant Unit 2

DOCKET NUMBER (2)

0 5 0 0 0 3 0 6

PAGE (3)

1 OF 0 4

TITLE (4)

Discovery That Certain Piping Inspections Are Not Being Made  
As Required By ASME Section XI Due To Personnel Error

EVENT DATE (5)

LER NUMBER (6)

REPORT DATE (7)

OTHER FACILITIES INVOLVED (8)

MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	RAYSON NUMBER	MONTH	DAY	YEAR	FACILITY NAME(S)	DOCKET NUMBER(S)
03	27	91	91	001	0004	26	91		Prairie Island Unit 1	05000282
										05000111

OPERATING MODE (9)

N

THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR 5. (Check one or more of the following) (11)

20.402(b)

20.405(a)

50.73(a)(2)(iv)

73.71(b)

POWER LEVEL (10)

0.97

20.406(a)(1)(i)

50.73(a)(1)

50.73(a)(2)(iv)

73.71(a)

20.406(a)(1)(ii)

50.73(a)(2)

50.73(a)(2)(iv)

OTHER (Specify in Abstract below and in Text, NRC Form 256A)

20.406(a)(1)(iii)

50.73(a)(2)(iii)

50.73(a)(2)(iii)(A)

20.406(a)(1)(iv)

50.73(a)(2)(iv)

50.73(a)(2)(iv)(B)

20.406(a)(1)(v)

50.73(a)(2)(v)

50.73(a)(2)(v)

LICENSEE CONTACT FOR THIS LER (12)

NAME

Arne A Hunstad

TELEPHONE NUMBER

AREA CODE

6 1 2

3 8 8 - 1 1 2 1

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NRC

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE)

X NO

EXPECTED SUBMISSION DATE (15)

MONTH DAY YEAR

ABSTRACT (Limit to 1400 words, i.e., approximately fifteen single-spaced typewritten lines) (16)

On March 27, 1991, both units were operating at full power. SP1168.8, Cooling Water Operational Pressure Test, was undergoing review in preparation for routine performance of the procedure. During the review, the system engineer noticed that a portion of the required testing was missing from the procedure. The procedure requires a walkdown inspection of cooling water piping in Unit 1 containment, but does not require inspection of cooling water piping in Unit 2 containment, as it should. On March 28, 1991, the ASME Section XI Test Coordinator reviewed the program for similar deficiencies and found that inspection of auxiliary feedwater piping in Unit 2 containment had also been omitted. These tests are required to be performed every 3 1/3 years.

After discovery, work requests were written to perform the omitted inspections. These inspections were completed on April 5, 1991; no problems were identified.

Cause of the event was personnel error; there was inadequate review of procedures.

The procedure for administering the ASME Section XI Program will be revised to include the requirement for a second level review of all program additions, deletions and interpretations.

NRC FORM 366A (5-89)		U.S. NUCLEAR REGULATORY COMMISSION		APPROVED OMB NO. 3150-0104 EXPIRES 4/30/92							
<b>LICENSEE EVENT REPORT (LER)</b> <b>TEXT CONTINUATION</b>				ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.							
FACILITY NAME (1)		DOCKET NUMBER (2)		LER NUMBER (5)							
Prairie Island Unit 2		0 5 0 0 0 3 0 6 9 1		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="font-size: x-small;">YEAR</th> <th style="font-size: x-small;">SEQUENTIAL NUMBER</th> <th style="font-size: x-small;">REVISION NUMBER</th> </tr> <tr> <td style="text-align: center;">00</td> <td style="text-align: center;">1</td> <td style="text-align: center;">00</td> </tr> </table>		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	00	1	00
YEAR	SEQUENTIAL NUMBER	REVISION NUMBER									
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				PAGE (3) 0 2 OF 0 4							

TEXT (if more space is required, use additional NRC Form 366A-1 (17))

EVENT DESCRIPTION

On March 27, 1991, both units were operating at full power. SP1168.8, Cooling Water Operational Pressure Test, was undergoing review in preparation for routine performance of the procedure. During the review, the system engineer noticed that a portion of the required testing was missing from the procedure. The procedure requires a walkdown inspection of cooling water piping in Unit 1 containment, but does not require inspection of cooling water piping in Unit 2 containment, as it should. On March 28, 1991, the ASME Section XI Test Coordinator reviewed the program for similar deficiencies and found that inspection of auxiliary feedwater piping in Unit 2 containment had also been omitted. These tests are required to be performed every 3 1/3 years. After discovery, work requests were written to perform the omitted inspections. These inspections were completed on April 5, 1991; no problems were identified.

Note that this was not an event that presented itself to the plant operators. It was an administrative event and therefore there is no discussion of the event from the perspective of the operator.

CAUSE OF THE EVENT

Cause of the event was personnel error; there was inadequate review of procedures.

ANALYSIS OF THE EVENT

The purposes of the piping inspection are to detect component leakage and to verify operability of pipe supports and restraints.

Leakage would have been detected by any of several other means. For example:

The 10-year hydrostatic test was performed on the subject cooling water piping in 1985 and again during the 1990 refueling outage following modification work.

The 10-year hydrostatic test was performed on the subject auxiliary feedwater piping in 1985.

Routine monthly inspections of containment are performed. These inspections include visual examination for leakage. Leakage from piping in containment would be noticed during these inspections.



LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATION

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 500 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-530), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
Prairie Island Unit 2	0 5 0 0 0 3 0 6 9 1	—	0 0 1	—	0 0	0 3 OF 0 4

TEXT (in more space is required, use additional NRC Form 366A's) (17)

Containment fan-coil unit condensate collection pots are monitored routinely by operators on their rounds to detect any leakage that results in high humidity in containment, and cooling water leakage at the fan-coil units themselves. The collection pots also have a high level alarm that annunciates in the control room.

Containment sump pump run times are also monitored to detect leakage in containment.

Because of these other means of leak detection and because no problems were discovered when the required inspections were completed on April 5, 1991, there was no adverse effect on public health and safety.

This event is being reported pursuant to 10CFR50.73(a)(2)(1)(B) since omission of the required testing is a violation of Technical Specifications 4.2.

CORRECTIVE ACTION

Upon discovery of the inadequate procedure on March 27th, a thorough review of the program was made by the ASME Section XI Coordinator. On March 28th, a further deficiency in inspection of auxiliary feedwater piping was identified.

Work requests were written to perform the inspections of those sections of cooling water and auxiliary feedwater piping that had not been properly inspected. The inspections were completed on April 5, 1991.

All operating pressure test procedures were reviewed by a quality control specialist familiar with the plant's ASME Section XI Program. The specialist was instructed to verify that all tests were completed as required, that all sections of piping and valves were included in the tests and that they were adequately described, and that all program requests for relief had been properly implemented. This review detected documentation weaknesses, but no other missed inspections or tests were uncovered. All recommendations made as a result of the review will be incorporated into the affected procedures before they are again used.

The procedure for administering the ASME Section XI Program will be revised to include the requirement for a second level review of all program additions, deletions and interpretations.

LICENSEE EVENT REPORT (LER)  
TEXT CONTINUATIONESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS  
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FACILITY NAME (1)

DOCKET NUMBER (2)

LER NUMBER (5)

PAGE (3)

Prairie Island Unit 2

0 5 0 0 0 3 0 6

YEAR SEQUENTIAL REVISION  
NUMBER NUMBER NUMBER

9 1 0 0 1 0 0 0 4 OF 0 4

TEXT (If more space is required, use additional NRC Form 305A-1 (17))

FAILED COMPONENT IDENTIFICATION

None.

PREVIOUS SIMILAR EVENTS

The only similar event reported previously was Unit 1 LER 90-015 in which Section XI tests were omitted from procedures during the revision process.